

FCC FORM 481 (July 2015), Line 510
Descriptive Document for Service Quality Standards &
Consumer Protection Rules Compliance
Per Instruction for Completing FCC Form 481

This document details the processes and procedures that Western Wahkiakum County Telephone Company (the "Company") follows to ensure compliance with services quality standards and consumer protections rules as set forth in the Instructions for completing FCC Form 481. It applies with respect to both the Company's voice telephone service and the Company's broadband service.

For service quality standards that relate to plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically trained and reviewed on issues involving service quality standards and consumer protections, including Identity Theft Prevention (Red Flag) and Consumer Propriety Network Information (CPNI) rules. In particular, if any set of issues appears to be prevalent, employees are given additional training on how to handle such issues.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed. It should be noted that the Company has received no customer complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which are not caused by the Company.

FCC FORM 481 (July 2015), Line 1210
Terms and Conditions of Voice Telephony Lifeline Plans
Per Instructions for Completing FCC Form 481

Western Wahkiakum County Telephone Company doing business as Wahkiakum West Telephone provides Lifeline and Washington Telephone Assistance Program (WTAP) Benefits to qualified subscribers in Grays River, Naselle and Rosburg, Washington. Customers may qualify for Lifeline and/or WTAP Service if certain low-income eligibility requirements are met.

The Company provides flat rate local exchange service to its Lifeline and WTAP subscribers. It does not offer measured local exchange service or measured Extended Area Service (EAS), so the number of local exchange service and EAS minutes that are provided as part of the Lifeline and WTAP plans are essentially unlimited. EAS exists between the Company's Grays River and Naselle exchanges.

The Company does not provide toll services to its Lifeline or WTAP subscribers, but does provide access to toll service providers. Company Lifeline and WTAP subscribers have to choose their own toll service providers. Accordingly, subscribers to the Company's Lifeline and WTAP services do not incur any Company toll charges, but they may incur toll charges from the toll service providers they select.

Lifeline benefits include a discount of \$9.25 per month on basic residential telephone service. WTAP benefits include a discount of \$3.25 per month. Customers of Wahkiakum West receiving both Lifeline and WTAP credits pay only \$8.00 per month for basic residential telephone service, not including taxes and surcharges.

No Company charges, other than those for the local exchange service and EAS that are included in the Company's Lifeline or WTAP plans, are required in order for a qualifying low-income consumer to receive Lifeline and/or WTAP service from the Company.

WTAP benefits also include discounting one half of the connection fee, up to \$22, when activating or moving qualifying residential service.



June 26, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
455 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 14-58 –
Annual Report due July 1, 2015, FCC Form 481 for
Rate of Return Carriers Receiving High-Cost Support –
47 C.F.R. § 54.313(f)(1) "Milestone Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with FCC Form 481 due July 1, 2015, and in compliance with Section 53.313(f)(1) of the Commission's rules, Western Wahkiakum County Telephone Company (Study Area 522451) hereby certifies that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Sincerely,

WESTERN WAHKIAKUM COUNTY TELEPHONE COMPANY

BY

Steven M. Appelo
President

FCC FORM 481 (July 2015), Line 3012
Progress Report on Five-Year Plan – Community Anchor Institutions
Per Instructions for Completing FCC Form 481

Western Wahkiakum County Telephone Company's network is capable of providing broadband services with speeds at or above the required speeds of 4 Mbps downstream and 1 Mbps upstream to all identified community anchor institutions within Western Wahkiakum County Telephone Company's serving area. That capability was in place as of January 1, 2014, was in place as of December 31, 2014, and is in place as of the date of the FCC Form 481 to which this report is attached.